

IN THE UNITED STATES DISTRICT COURT

For the Southern District of California

SECURITIES AND EXCHANGE
COMMISSION
Plaintiff,

V.

Case No. 02cv84 DMS (RBB)

JAMES E. FRANKLIN,
Defendant.

Exhibit No.	Description
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Ex. 425 Phoenix/ISE documents

DEx. 342,190-2 Beroff's AXPL restructuring

Ex. 140 AXPL Form M-11

Ex. 304 Crest Loans to AXPL

Ex. 371 IPO Consultants Proceeds

Ex. 372 SEC's Proceeds Calculations

Ex. 378 Summary of Reinvestments

Ex. 203 Casmyn Trading Loss

Ex. 385 Wolanyk Redhotstock's Publish Dates

Ex. 572 Wire Confirms MSP & John Jackson

Ex. 580 Medical Documentation of Visual Impairment and Surgery

Exhibit 425 — Phoenix BLP / Internet Stock Exchange (ISE) Financial Summary Documents

This exhibit contains financial records showing that Phoenix BLP received a \$115,000 loan from Vector Keel (see page 4) and deposited a total of \$165,636.84. After deducting the investment loan, the net sales from independent sources totaled **\$50,636.84**.

This supports Petitioner's position that Phoenix BLP was a real business venture with verifiable outside financing—not a hidden conduit for personal profit. The Court is respectfully advised that the complete 35-page original of this exhibit should be available in the Court's archived trial record.

Phoenix BLP

Check Register 10/25/1996 through 11/05/1999

526

PHOENIX BLP, INC.

3/22/2005

Register: Checking

From 10/25/1996 through 03/22/2005

Sorted by: Date, Type, Number/Ref

Date	Number	Payee	Account	Memo	Payment	C	Deposit	Balance
10/25/1996			Sales	Initial Deposit		X	100.00	100.00
10/29/1996			Sales	Studio S		X	15,984.00	16,084.00
10/29/1996	2	PHAREE MOHTUA	Payroll Expenses:Gross Wages:...	*3740 less \$350	2,800.00	X		13,284.00
10/29/1996	3	SEREE SUWANPINAN	Payroll Expenses:Gross Wages:...	2824	1,425.00	X		11,859.00
10/29/1996	9	TINA CHERDSURIYA	Payroll Expenses:Gross Wages:...	50274	1,033.00	X		10,826.00
11/05/1996			Bank Service Charges	Checks	11.00	X		10,815.00
11/06/1996			Bank Service Charges	Debit Memo ???	16.42	X		10,798.58
11/09/1996			Sales	Studio S		X	8,870.00	19,668.58
11/11/1996	7	SOMSONG TANASOOK	Payroll Expenses:Gross Wages:...	*2825 partial	240.00	X		19,428.58
11/11/1996	1002	SUNTHON SATHI PHANU...	Payroll Expenses:Gross Wages:...	2829 partial	530.00	X		18,898.58
11/18/1996			Sales	Studio S		X	3,000.00	21,898.58
11/18/1996			Bank Service Charges		21.03	X		21,877.55
11/18/1996	1007	PRINDA NOGERAT	Payroll Expenses:Gross Wages:...	10358	477.00	X		21,400.55
11/18/1996	1011	SUNTHON SATHI PHANU...	Payroll Expenses:Gross Wages:...	2829 bal	85.00	X		21,315.55
11/18/1996	1014	SOMSONG TANASOOK	Payroll Expenses:Gross Wages:...	*2825 bal	129.00	X		21,186.55
11/20/1996			Sales	Studio S		X	10,000.00	31,186.55
11/22/1996	1019	COSME FLORES	Payroll Expenses:Cutting, Sam...		174.00	X		31,012.55
11/25/1996			Sales	Cchk		X	5,172.00	36,184.55
11/25/1996	1026	MUKDA SIRIEKAPHONG	Payroll Expenses:Patterns		305.98	X		35,878.57
11/25/1996	1027	MASAKO CANONGE	Payroll Expenses:Patterns		115.25	X		35,763.32
11/29/1996			Bank Service Charges	Per Check Charges (...)	4.25	X		35,759.07
12/06/1996			Sales			X	5,425.00	41,184.07
12/06/1996	1028	KIYO KAWAI	Payroll Expenses:Gross Wages:...	*2494	450.00	X		40,734.07
12/06/1996	1030	COSME FLORES	Payroll Expenses:Cutting, Sam...		174.00	X		40,560.07
12/18/1996			Bank Service Charges		21.22	X		40,538.85
12/19/1996			Sales			X	9,850.00	50,388.85
12/20/1996	1038	COSME FLORES	Payroll Expenses:Cutting, Sam...		164.00	X		50,224.85
12/20/1996	1040	DIETER RAABE	Professional Fees		2,000.00	X		48,224.85

PHOENIX BLP, INC.

3/22/2005

Register: Checking

From 10/25/1996 through 03/22/2005

Sorted by: Date, Type, Number/Ref

Date	Number	Payee	Account	Memo	Payment	C	Deposit	Balance
12/31/1996			Sales			X	5,200.00	53,424.85
12/31/1996			Bank Service Charges		1.50	X		53,423.35
01/03/1997	1037	GEORGE SHIMAZU	Accounts Payable	1037	1,800.00	X		51,623.35
01/16/1997	1036	BUNDIT RUAMSRI	Accounts Payable	011697	420.00	X		51,203.35
01/16/1997	1041	TIDALAD LUAMSRI	Payroll Expenses:Gross Wages:...		420.00	X		50,783.35
01/17/1997	1042	LOR PHOOKDUANG	Payroll Expenses:Gross Wages:...	7972	2,841.00	X		47,942.35
01/17/1997	1043	GEORGE SHIMAZU	Accounts Payable	011797	1,800.00	X		46,142.35
01/21/1997			Sales			X	8,000.00	54,142.35
01/24/1997	1044	KIYO KAWAI	Accounts Payable	1044	685.00	X		53,457.35
01/24/1997	1045	ALICE TAI LAI	Payroll Expenses:Gross Wages:...		492.00	X		52,965.35
01/24/1997	1046	DIETER RAABE	Professional Fees		2,050.00	X		50,915.35
01/31/1997	1047	PRINDA SUMRITMEEPHOL	Payroll Expenses:Gross Wages:...	2833	120.00	X		50,795.35
01/31/1997	1048	CHAVEVAN KANCHANA	Payroll Expenses:Gross Wages:...	or	82.50	X		50,712.85
01/31/1997	1049	MASAKO CANONGE	Payroll Expenses:Patterns		115.87	X		50,596.98
01/31/1997	1050	MUKDA SIRIEKAPHONG	Payroll Expenses:Patterns		309.04	X		50,287.94
01/31/1997	1051	GEORGE SHIMAZU	Accounts Payable	7873,7874/75	2,465.00	X		47,822.94
01/31/1997	1052	PHAIRIE MOHTUA	Payroll Expenses:Gross Wages:...	3747, -350	2,550.00	X		45,272.94
01/31/1997	1054	BUNDIT RUAMSRI	Accounts Payable	013197	501.00	X		44,771.94
01/31/1997	1055	BUNDIT RUAMSRI	Accounts Payable	013197	501.00	X		44,270.94
02/04/1997			Sales			X	5,000.00	49,270.94
02/05/1997			Sales			X	5,500.00	54,770.94
02/05/1997	1056	LOR PHOOKDUANG	Payroll Expenses:Gross Wages:...	7937 less 350	2,047.00	X		52,723.94
02/14/1997	1057	GEORGE SHIMAZU	Accounts Payable	1057	1,800.00	X		50,923.94
02/14/1997	1058	LALAD MANAS	Payroll Expenses:Gross Wages:...	J9 F2	1,220.00	X		49,703.94
02/14/1997	1060	LALAD MANAS	Payroll Expenses:Gross Wages:...	2837	1,047.00	X		48,656.94
02/14/1997	1061	NIBOND LERTSAKUMA...	Payroll Expenses:Gross Wages:...	2838	807.00	X		47,849.94
02/14/1997	1062	CHANPEN CHATSAYANON	Payroll Expenses:Gross Wages:...	2839	225.00	X		47,624.94
02/14/1997	1063	SAMSONG SAENGOW	Payroll Expenses:Gross Wages:...	2836	1,604.00	X		46,020.94

PHOENIX BLP, INC.

3/22/2005

Register: Checking

From 10/25/1996 through 03/22/2005

Sorted by: Date, Type, Number/Ref

Date	Number	Payee	Account	Memo	Payment	C	Deposit	Balance
02/14/1997	1064	PHAIRÉE MOHTUA	Payroll Expenses:Gross Wages:...	2840	333.00	X		45,687.94
02/14/1997	1065	KIYO KAWAI	Accounts Payable	2841	234.00	X		45,453.94
02/14/1997	1066	BUNDIT RUAMSRI	Accounts Payable	2835	412.00	X		45,041.94
02/18/1997			Sales			X	6,743.00	51,784.94
02/28/1997			Bank Service Charges		1.50	X		51,783.44
02/28/1997	1067	KEATTISUK MANUS	Payroll Expenses:Gross Wages:...	157604	2,632.20	X		49,151.24
02/28/1997	1068	BUNDIT RUAMSRI	Accounts Payable	27230	1,365.00	X		47,786.24
02/28/1997	1069	LOR PHOOKDUANG	Payroll Expenses:Gross Wages:...	7975,7976	7,121.00	X		40,665.24
02/28/1997	1070	KIYO KAWAI	Accounts Payable	24495	789.50	X		39,875.74
02/28/1997	1071	GEORGE SHIMAZU	Accounts Payable	7878,7879	2,184.00	X		37,691.74
02/28/1997	1072	LALAD MANAS	Payroll Expenses:Gross Wages:...	2wks to 2/22	1,100.00	X		36,591.74
02/28/1997	1073	PHAIRÉE MOHTUA	Payroll Expenses:Gross Wages:...	3748 partial	2,762.00	X		33,829.74
03/03/1997			Sales			X	16,280.00	50,109.74
03/07/1997			Loan Payable	VK		X	45,000.00	95,109.74
03/07/1997	1074	KIYO KAWAI	Accounts Payable	24496	1,212.50	X		93,897.24
03/07/1997	1075	BUNDIT RUAMSRI	Accounts Payable	27232	4,060.00	X		89,837.24
03/07/1997	1076	NAOVARA SAELOR	Payroll Expenses:Gross Wages:...	7883	547.50	X		89,289.74
03/07/1997	1077	STID CHUERSA-NGA	Payroll Expenses:Gross Wages:...	7877	815.00	X		88,474.74
03/07/1997	1078	PHAIRÉE MOHTUA	Payroll Expenses:Gross Wages:...	3748 balance	2,700.00	X		85,774.74
03/07/1997	1080	CREST SERVICES	Professional Fees	Consulting	5,000.00	X		80,774.74
03/07/1997	1082	DIETER RAABE	Professional Fees	Consulting	18,984.00	X		61,790.74
03/10/1997	1083	DIETER RAABE	Professional Fees	Consulting	9,789.00	X		52,001.74
03/11/1997	1208	KIYO KAWAI	Accounts Payable	22569	311.00	X		51,690.74
03/14/1997			Sales	Studio S		X	10,000.00	61,690.74
03/14/1997	1084	MASAKO CANONGE	Payroll Expenses:Patterns	3 days	347.61	X		61,343.13
03/14/1997	1085	MUKDA SIRIEKAPHONG	Payroll Expenses:Patterns	3 days	462.69	X		60,880.44
03/14/1997	1086	CHAVEVAN KANCHANA	Payroll Expenses:Gross Wages:...	21 hrs	147.00	X		60,733.44
03/14/1997	1088	LALAD MANAS	Payroll Expenses:Gross Wages:...	2 wks	1,100.00	X		59,633.44

PHOENIX BLP, INC.

3/22/2005

Register: Checking

From 10/25/1996 through 03/22/2005

Sorted by: Date, Type, Number/Ref

Date	Number	Payee	Account	Memo	Payment	C	Deposit	Balance
03/14/1997	1089	KIYO KAWAI	Accounts Payable	24498	315.00	X		59,318.44
03/14/1997	1090	LOR PHOOKDUANG	Payroll Expenses:Gross Wages...	7999, less 350	2,632.50	X		56,685.94
03/14/1997	1091	KIYO KAWAI	Accounts Payable	24499	960.00	X		55,725.94
03/14/1997	1092	SUMONTHA INSONG	Payroll Expenses:Gross Wages...	157606	1,089.00	X		54,636.94
03/14/1997	1093	KEATTISUK MANUS	Payroll Expenses:Gross Wages...	157605	1,164.00	X		53,472.94
03/14/1997	1094	GEORGE SHIMAZU	Accounts Payable	7884	1,904.15	X		51,568.79
03/14/1997	1095	BUNDIT RUAMSRI	Accounts Payable	27237,less 350	1,319.50	X		50,249.29
03/21/1997	1096	KIYO KAWAI	Accounts Payable	24500	528.00	X		49,721.29
03/21/1997	1097	NAOVARA SAELO	Payroll Expenses:Gross Wages...	2841,2843, last, b/to t...	309.00	X		49,412.29
03/21/1997	1098	PHAIRIE MOHTUA	Payroll Expenses:Gross Wages...	127451 partial	2,000.00	X		47,412.29
03/21/1997	1099	LOR PHOOKDUANG	Payroll Expenses:Gross Wages...	7978, partial	2,680.32	X		44,731.97
03/21/1997	1100	BUNDIT RUAMSRI	Accounts Payable	27233,partial	2,158.00	X		42,573.97
03/21/1997	1101	STID CHUERSA-NGA	Payroll Expenses:Gross Wages...	6741	1,286.00	X		41,287.97
03/25/1997			Sales	ss		X	10,000.00	51,287.97
03/27/1997			Loan Payable	VK		X	20,000.00	71,287.97
03/28/1997	1102	PRINDA SUMRTMEEPHOL	Payroll Expenses:Gross Wages...	2844	710.50	X		70,577.47
03/28/1997	1103	BUNGON VONGPEERUK	Accounts Payable	2845	586.00	X		69,991.47
03/28/1997	1104	PHAIRIE MOHTUA	Payroll Expenses:Gross Wages...	127451 balance	2,500.00	X		67,491.47
03/28/1997	1106	LALAD MANAS	Payroll Expenses:Gross Wages...	2 wks	1,100.00	X		66,391.47
03/28/1997	1107	LOR PHOOKDUANG	Payroll Expenses:Gross Wages...	7978, balance	2,500.00	X		63,891.47
03/28/1997	1108	GEORGE SHIMAZU	Accounts Payable	7885/86	2,218.00	X		61,673.47
03/28/1997	1109	BUNDIT RUAMSRI	Accounts Payable	27233, balance	2,000.00	X		59,673.47
03/31/1997			Bank Service Charges		6.00	X		59,667.47
04/03/1997			Loan Payable	VK		X	115,000.00	174,667.47
04/03/1997	1111	KEATTISUK MANUS	Payroll Expenses:Gross Wages...		408.00	X		174,259.47
04/04/1997			Bank Service Charges	OD Fee	25.00	X		174,234.47
04/04/1997	1112	MBNA 75	Other Expenses	DR	3,048.01	X		171,186.46
04/04/1997	1113	DIETER RAABE	CONSULTING	Consulting	61,500.00	X		109,686.46

DISCOVERY EXHIBITS 342; 190-192

Discovery Exhibit 342: Excerpts of Arthur Beroff's investigative testimony referencing AXPL share structuring and investor involvement. Petitioner references this testimony based on SEC's own pretrial exhibit list; the underlying transcript is not in Petitioner's possession and has not been made available.

Discovery Exhibits: 190–192 SEC investigative records and correspondence related to AXPL's early capitalizations and Beroff's parents investor coordination. Not in Petitioner's possession.

Exhibit 304 – AXPL Form 12g Filing: Private Placement & Financing Disclosure

This official SEC filing by **Amalgamated Explorations Inc. (AXPL)** documents the lawful and independently structured financial foundation of the company. Key disclosures support Petitioner's position that AXPL was a legitimate, capitalized venture—not a fraudulent promotion:

- **Private Placement Disclosure (Page 3):** In February 1997, AXPL completed a **\$1,006,630 private placement** by issuing **402,652 unregistered and restricted shares** to **37 investors** at **\$2.50/share**, pursuant to **Rule 504 of Regulation D** and **Section 4(2)** of the Securities Act. This demonstrates independent investor confidence and valid funding separate from promotional activity.
- **Crest Loan Disclosure (Page 70):** AXPL discloses a **\$200,000 loan from Crest Ventures**, an investment entity affiliated with the Petitioner. This substantiates that Petitioner's role was financial, not fraudulent, and was part of a structured syndicate model with documented, arm's-length investments.
- **Preexisting Filing Status:** The M-11 filing with the State of New York predated any RedHotStocks activity and was independently handled by outside consultant Arthur Beroff. This undermines the SEC's theory of coordinated promotional fraud.

Note: This is an official SEC filing and should be part of the Court's original record or accessible from the Court's archival docket in this matter.



UNITED STATES OF AMERICA
SECURITIES AND EXCHANGE COMMISSION

ATTESTATION

I HEREBY ATTEST

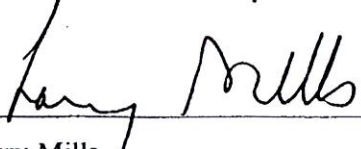
that:

*Attached is a copy of, registration statement on Form 10SB12G,
received in this Commission November 5, 1999, under the name
Amalgamated Explorations, Inc., File No. 0-27979, pursuant to the
provisions of the Securities Exchange Act of 1934.*

on file in this Commission

March 3, 2004

(Date)


Larry Mills

Records Officer

It is hereby certified that the Associate Executive Director, Office of Filings and Information Services, U.S. Securities and Exchange Commission, Washington, D.C., which Commission was created by the Securities Exchange Act of 1934 (15 U.S.C. 78a et seq.) is official custodian of the records and files of said Commission, and all records and files created or established by the Federal Trade Commission pursuant to the provisions of the Securities Act of 1933 and transferred to this Commission in accordance with Section 210 of the Securities Exchange Act of 1934, and was such official custodian at the time of executing the above attestation, and that he/she, and persons holding the positions of Deputy Director, Associate Directors, Special Assistant to the Director, Records Officer, Branch Chief of Records Management, and the Program Analyst for the Records Officer, or any one of them, are authorized to execute the above attestation.

For the Commission


Jonathan G. Katz
Secretary

SEC 334 (6-03)

PLAINTIFF'S
EXHIBIT

304
02-CV-84

EXHIBIT

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Under Section 12(b) or (g) of the Securities Exchange Act of 1934

FORM 10SB12G OF AMALGAMATED EXPLORATIONS, INC.

(Name of small business issuer in its charter)

Colorado Fed ID #86-0551529
(State or other jurisdiction (IRS Employer)
of incorporation or organization Identification

1645 Court Place, Suite 201, Denver, CO 80202
(Address of principal executive offices) Zip Code

Issuer's telephone number: (303) 629-5115

Securities registered pursuant to Section 12(b) of the Act: NONE

Securities registered pursuant to Section 12(g) of the Act:
Common Stock
(Title of Class)

PART I

Item 1 - Description of Business

General

Amalgamated Explorations, Inc. (the "Company") was incorporated in Colorado in May 1986. The Company is engaged in the oil and gas business in the continental United States. As of June 30, 1999 the Company employed 2 persons on a full-time basis and 5 persons on a part-time basis. Between the date of its incorporation and April 1989 the Company was inactive. Between April 1989 and December 1994 the Company was involved in the design, manufacture and sale of women's sportswear.

In January 1996, the Company's Board of Directors approved a ten-for-one reverse split of the Company's common stock.

In February 1996 the Company acquired all of the issued and outstanding shares of Gold Basin Exploration, Inc. ("Gold Basin") in consideration for 2,347,109 shares of the Company's common stock. (See EXHIBIT INDEX PART III)

At the time of this acquisition Gold Basin held what are now the Company's interests in the Boone Dome and Cave Gulch prospects. In connection with the acquisition of Gold Basin, Ted Murer and George Kirn, both of whom are officers and directors of the Company, were the principal shareholders of Gold Basin and received 1,332,409 and 621,600 shares, respectively, of the Company's common stock in exchange for their shares in Gold Basin.

In May 1996 the Company issued 50,000 "unregistered" and "restricted" shares of its common stock to Chris Van Dwyne a consultant in return for legal services rendered.

In August 1996 the Company issued 500,000 shares of its common stock pursuant to an exemption provided by Regulation 504 of Regulation D and Regulation M-11 of the State of New York to 2 individuals in consideration of \$50,000.

In June 1996 the Company issued 13,530 "unregistered" and "restricted" shares of its common stock to 10 individuals in return for services rendered.

In November 1996, the Company issued 300,000 shares of its common stock in exchange for all of the issued and outstanding shares of MSP Technologies, Inc. ("MSP"), a corporation which had developed a low frequency instrument (known as the Electrotelluric Survey) which quickly and effectively detects oil and gas deposits to depths up to 17,000 feet. This acquisition resulted

in MSP becoming a wholly owned subsidiary of the Company.

In February 1997 the Company issued 402,652 "unregistered" and "restricted" shares of its common stock to 37 investors pursuant to an exemption provided by Rule 504 of Regulation D and Section 4(2) of the Securities Act at a price of \$2.50 per share for a total cash consideration to the company of \$1,000,000.

In May of 1997 the Company issued 6,000 shares of "unregistered" and "restricted" shares of its common stock to three investors pursuant to an exemption provided by Regulation 504 and Section 4(2) of the Securities Act at a price of \$2.50 per share for a total cash consideration of \$15,000.

In December 1997 pursuant to an exemption provided by Rule 504 of Regulation D and Section 4(2) of the Securities Act the Company issued 180,000 shares of "unregistered" and "restricted" shares of its common stock to IPO Consultants, pursuant to an option granted in connection with the Company's acquisition of Gold Basin Explorations Inc., at a price of \$.10 per share for a total cash consideration of \$1,800.

Oil & Gas Exploration

The Company evaluates undeveloped oil and gas prospects and participates in drilling activities on those prospects which in the opinion of management are favorable for the production of oil or gas. Drilling activities may be financed through farmouts to other parties or by entering into joint ventures or other arrangements under which the Company acquires oil and gas acreage, performs basic geologic work on the prospect, and obtains the necessary equipment to complete a well if it is successful. In some cases, substantial interests (typically 1/8, 1/4, 1/2, etc.) may be sold to industry participants on a basis which will be sufficient to cover all or a part of the drilling costs attributable to the interest retained by the Company in a prospect. Under these arrangements, the Company will normally be expected to pay its share of any well completion costs. There is no assurance that any such arrangements will result in the discovery of oil or gas or the generation of income to the Company.

The Company also acquires interests in oil and gas leases for the purposes of either selling the leases subject to an overriding royalty or other form of retained interest, or entering into farmout, joint venture, or other arrangements, primarily with industry participants, for exploration of the leases.

Cave Gulch

The Company owns varying working interests in a 640-acre lease in the Cave Gulch field in Natrona County, Wyoming. The Company has a one point sixty four percent (1.64%) working interest and a one point thirty three percent (1.33%) net revenue interest in a gas well which produced from February 1998 until August 1998. In August 1998, the gas well blew out due to excessive pressure and has been shut down since that time. The Company and the other working interest owners in the well are re-entering the well in an effort to resume production. It is expected that the re-entering process will be completed by October 1999.

The Company and the other owners of the Cave Gulch lease may drill up to three additional wells on the leased acres. Each well is expected to cost approximately \$10,000,000 to drill and complete. The Company's working interests in these additional wells, should they be drilled, will vary from one point one percent (1.1%) to three point forty four (3.44%). The Company's net revenue interest in these wells, should commercial production be established, will vary from one point zero percent (1.0%) to three point two percent (3.2%).

The Company also has a zero point forty four percent (0.44%) working interest and a zero point thirty five percent (0.35%) net revenue interest in a second gas well drilled in the Cave Gulch field, which was completed in 1998. As of September 1999 this well was producing 8,000,000 cubic feet of gas per day.

LOAN AGREEMENT

This Agreement is made this 15th day of February, 1999 by and between John H. Resing, Lender's Agent representing Crest Services Ltd. and John H. Resing, Trustee FBO John H. Resing Retirement Trust (the "Lender") and Amalgamated Explorations, Inc. (the "Company") for the purpose of setting forth the terms and conditions upon which the Lender will advance funds to the Company.

NOW THEREFORE, THE PARTIES HERETO AGREE AS FOLLOWS:

1. The Lender agrees to advance up to \$450,000 to the Company in accordance with the form of Promissory Note attached as Exhibit A.

2. Any advances against the Note will be secured by all assets of the Company pursuant to the form of Security Agreement attached as Exhibit B. A UCC financing statement pertaining to the Company's personal property will be filed in Colorado, Wyoming, Nevada and Montana. Mortgages and/or deeds of trust pertaining to the Company's oil, gas and mining properties will be filed in such states with the applicable county clerks and recorders.

3. The Company agrees to issue to the Lender a warrant, in the form attached as Exhibit C, to purchase one share of the Company's common stock for each two dollars of principal advanced. The warrant will have an initial exercise price of \$0.50 per share and will be exercisable at any time prior to December 31, 2000.

4. The Company agrees to appoint John H. Resing as Chairman of the Board of Directors of the Company and MSP Technologies. The compensation of \$8,000 per month payable to Milestone Capital as contemplated in the term sheet for the \$4.5 equity financing between the Company and Milestone Capital will be deferred pending the closing of the equity capital financing. Expenses accumulated to date by Resing and Seed & Berry (approximately \$30,000) will be paid from the first advance against the Note.

5. The Company and MSP waive the conflicts inherent in Resing's role and transactions in the future contemplated by the term sheet and the corporate opportunity doctrine applied to any of Resing's business opportunities, disclosed or undisclosed, that may have arisen prior to February 16, 1999 and his duty to represent the lenders in this transaction.

The addresses of the parties are:

John H. Resing
P.O. Box 1317
Bellevue, WA 98009
V: (425) 454 7992
F: (425) 454 4073

Crest Services, Ltd.
c/o Jim Franklin
5256 Greenwich Dr. Suite 250
San Diego CA 92122
V: (619) 552 0295
F: (619) 552 0173

AGREED TO AND ACCEPTED

JOHN H. RESING, LENDER'S AGENT
REPRESENTING CREST SERVICE, LTD.

By: /S/

JOHN H. RESING

JOHN H. RESING, FBO JOHN H. RESING
RETIREMENT TRUST

Exhibit 371 – IPO Consultants’ AXPL Trading Summary (Equitrade Securities)

Summary:

This exhibit presents transactional records from Equitrade Securities reflecting the trading activity of IPO Consultants in Amalgamated Explorations (AXPL) during 1997.

Key Data:

- **Gross Sales Proceeds:** \$1,042,097.74
- **AXPL Stock Purchases (June 1997):** \$532,500.00
- **Net Proceeds After Purchases:** \$509,597.74

Significance:

The inclusion of substantial purchase activity rebuts the SEC’s implication that IPO Consultants merely acted as a vehicle for stock dumping. Instead, the evidence reflects investment commitment, market participation, and a bona fide syndicate strategy—consistent with private investment banking activity, not pump-and-dump fraud.

This exhibit supports Petitioner’s claim that the AXPL shares were acquired and disposed of in the ordinary course of speculative venture investment—not in coordination with promotional misconduct.

Note:

Only the cover and relevant transactional pages are included herein for reference. The **full underlying exhibit is available in the Court’s archived trial materials.**

SUMMARY EXHIBIT 371**IPO, AVALON TRUST, AND VECTOR KEEL'S PROFITS ON SALES OF AXPL****JANUARY 20, 1997 THROUGH MAY 30, 1997**

Account	Broker Dealer	Exhibit Page	Number of Shares Sold	Realized Profits (Loss)
IPO	J ALEXANDER SECS	2	15,270	96,850
IPO	EQUITRADE SECURITIES	3	8,000	40,029
IPO	COWENS/SFI INVESTMENTS	4-5	98,000	883,625
AVALON TRUST	UNION SECURITIES	6	<u>17,600</u>	<u>219,496</u>
TOTALS IPO & AVALON TRUST			138,870	1,240,000
VECTOR KEEL	UNION SECURITIES	7	100,000	1,241,539
MATCHED IPO BUYS (SEE EXHIBIT 373)			<u>-47,500</u>	<u>-595,609</u>
ADJUSTED VECTOR KEEL SALES TOTALS			52,500	645,930
TOTALS IPO, AVALON TRUST & VECTOR KEEL			191,370	1,885,930

Exhibit 372 — Vector Keel Stock Sales Summary

This exhibit provides detailed documentation of Vector Keel's aggregate stock sales, including but not limited to Amalgamated Explorations (AXPL). The gross proceeds from all Vector Keel sales across all client companies totaled **\$2,817,693**, as disclosed in this exhibit and cited in the Motion for Relief.

Of this amount, **\$1,241,539** pertains to AXPL-related stock, offset by **\$595,609** in matched IPO buys, resulting in **net AXPL proceeds of \$645,930**.

Only the summary page is included here for reference; the Court is respectfully referred to its full archived copy for the complete breakdown of transactions.

Total Stock Sales by Vector Keel (All Companies): \$2,817,693

SUMMARY EXHIBIT 372**VECTOR KEEL, LTD****PROFITS ON SALES OF STOCKS PROFILED ON RED HOT STOCKS**

Stocks Sold	Exhibit Page	Number of Shares Sold	Realized Profits
Amalgamated Explorations (AXPL)	2	100,000	\$1,241,539
Matched IPO Buys (See Exh 373)		-47,500	-\$595,609
Net AXPL Totals		<u>52,500</u>	<u>\$645,930</u>
Net USA (NTSA)	3-5	120,190	\$1,164,829
Neotherapeutics (NEOT)	6	47,500	\$9,873
LCA Vision (LCAV)	7-8	72,400	\$46,019
Easy Cellular, Inc., (EZCL)	9-11	330,655	\$745,019
WaterPur International (WPUR)	12-13	400,000	\$205,427
American Technologies Group (ATEG)	14	<u>55,500</u>	<u>\$597</u>
TOTALS		1,078,745	\$2,817,693

EXHIBIT 378

Subject: Reinvestment Transfers

Description: Verified wire transfers from IPO Consultants and Vector Keel to AXPL, NTSA, Red Rooster, MSP Technologies, and others.

Relevance: Demonstrates that nearly all proceeds were reinvested in client ventures.

SUMMARY EXHIBIT 378

VECTOR KEEL WIRES FROM ACCOUNT
UNION SECURITIES ACCOUNT NUMBER 028-525U-9

Date	Payee	Amount	Recipient	Citation
02/06/97	INVESTORS RESEARCH	\$20,000.00	TO BARCLAYS BANK, GRAND TURK #1278286	EXHIBIT 572 BCSC 0224-0227
02/21/97	NETUSA	\$7,500.00	TO MERRILL #233-07P48	EXHIBIT 572 BCSC 0228-0231
02/21/97	VECTOR KEEL	\$95,000.00	TO BRACLAYS BANK, GRAND TURK # 4336694	EXHIBIT 572 BCSC 0232-0235
03/06/97	NETUSA	\$400,000.00	TO MERRILL LYNCH, #233-07P48	EXHIBIT 572 BCSC 0236-0237
03/07/97	PHOENIX, BLP	\$45,000.00	TO NORWEST BANK #6420138093	EXHIBIT 572 BCSC 0238-040
03/28/97	PHOENIX BLP	\$20,000.00	TO NORWEST BANK, #6420138093	EXHIBIT 572 BCSC 0241-0243
03/28/97	CREST SERVICES	\$105,000.00	TO DIE ERSTE OESTER (AUSTRIA)	EXHIBIT 572 BCSC 0299-0302
04/03/97	PHOENIX BLP	\$115,000.00	TO NORWEST BANK, #6420138093	EXHIBIT 572 BCSC 0244-0247
04/22/97	ICSL TRUST	\$50,000.00	TO SMITH BARNEY # 427-79698	EXHIBIT 572 BCSC 0248-0251
05/07/97	RED ROOSTER AND SENSE INC	\$20,000.00	TO BANK OF AMERICA, #02831-60373	EXHIBIT 572 BCSC 0252-0254
05/21/97	JACKSON, JOHN	\$43,750.00	TO FIRST UNTD BK OF DENVER #5090000102	EXHIBIT 572 BCSC 0255-0257
05/27/97	EASY CELLULAR	\$62,500.00	TO NEVADA STATA BANK #212 000 376	EXHIBIT 572 BCSC 0258-0260
06/11/97	HENDRICKS, WALTER & ELAINE	\$15,000.00	TO WELLS FARGO BANK #0835-788-209	EXHIBIT 572 BCSC 0261-0263
06/11/97	GOODING(?)	\$250,000.00	TO GEORGIAN TRUST #4572323E4	EXHIBIT 572 BCSC 0264-0267
06/17/97	CREST SERVICES	\$25,000.00	TO BANK OF AMERICA #05623-11600	EXHIBIT 572 BCSC 0268-0270
07/16/97	HENDRICKS, WALTER & ELAINE	\$49,900.00	TO WELLS FARGO #0835-788-209	EXHIBIT 572 BCSC 0271-0274
07/22/97	VECTOR KEEL	\$474,057.00	TO BARCLAYS BANK, GRAND TURK #4336694	EXHIBIT 572 BCSC 0275-0276
07/24/97	INTERNET STOCK EXCHANGE	\$100,000.00	TO FIDELITY BROKERAGE #X54-124710	EXHIBIT 572 BCSC 0277-0281
07/24/97	RED ROOSTER SENSE INC	\$10,000.00	TO BANK OF AMERICA #02831-6073	EXHIBIT 572 BCSC 0277-0281
07/30/97	MSP TECHNOLOGIES	\$34,900.00	TO FIRST UNTD BK OF DENVER #4090000140	EXHIBIT 572 BCSC 0282-0284
08/05/97	VECTOR KEEL	\$347,250.00	TO BARCLAYS BANK, GRAND TURK #4336694	EXHIBIT 572 BCSC 0285-0286
08/06/97	HENDRICKS, WALTER & ELAINE	\$7,500.00	TO WELLS FARGO BANK, # 0835-788-209	EXHIBIT 572 BCSC 0287-0289
08/12/97	VECTOR KEEL	\$375,245.00	TO BARCLAYS BANK GRAND TURK, #4336694	EXHIBIT 572 BCSC 0290-0291
08/25/97	VECTOR KEEL	\$238,800.00	TO BARCLAYS BANK, GRAND TURK #433-6694	EXHIBIT 572 BCSC 0293-0294
08/28/97	RED ROOSTER AND SENSE INC	\$5,000.00	TO BANK OF AMERICA #02831-6073	EXHIBIT 572 BCSC 0295-0297

TOTALS

\$2,916,402.00

EXHIBIT 203

Subject: Casmyn Losses

Description: Vector purchased 40,000 shares of stock called in Casmyn Minerals in seven separate purchases from June 3rd, 2007 until June 20th, 2007 for a total investment of \$17,600 and then sold 20,000 of these shares on July 22nd 1997 for a total of \$120,000. Vector keel continued buying over 300,000 shares over the successive 8 months for a total of \$669,000.

Trading losses showing a \$669,000 loss on Casmyn Minerals incurred by Vector Keel.

Relevance: Shows no net profit from IPO/Vector operations.

Only the summary page is included here for reference; the Court is respectfully referred to its full archived copy for the complete breakdown of transactions.

Below is a tabulation of purchases from Exhibit 385.

Date	Quantity	Price	Amount
06/02/1997	10000	7.5	75000
06/03/1997	10000	7.5	75000
06/04/1997	10000	7	70000
06/05/1997	10000	6.75	67500
06/06/1997	10000	6.5	65000
06/09/1997	10000	6.25	62500
06/10/1997	10000	6	60000
06/11/1997	5000	5.75	28750
06/13/1997	5000	5.5	27500
06/17/1997	5000	5.25	26250
06/18/1997	5000	5	25000
06/19/1997	5000	4.75	23750
06/21/1997	5000	4.5	22500
06/25/1997	5000	4.25	21250
06/28/1997	5000	4	20000
06/30/1997	5000	3.75	18750
TOTAL	115000		<u>\$688,750</u>

Exhibit 385 — RedHotStocks Publish Dates by Sam Wolanyk

Exhibit No.	Description	Key Content	Relevance
Ex. 385	RedHotStocks Publish Dates by Sam Wolanyk	<p>Documented dates of stock profiles published by Sam Wolanyk on RedHotStocks.com, including:</p> <ul style="list-style-type: none">• AXPL: First publication 11 months after Form M-11 filing.• Casmyn (CMYN): Profiles on June 27, 1997 and October 11, 1997, followed by stock collapse and \$669,000 loss by Vector Keel.	<p>Establishes that promotional activity occurred well after AXPL's official M-11 registration, undermining claims of coordination. Shows Casmyn losses were a result of poor investment performance, not fraud.</p>

SUMMARY EXHIBIT 385**RED HOT PROFILES AND UPDATES**

Red Hot Stocks Home Page—Exhibit # 250

1. Amalgamated Explorations (“AXPL”)

Exhibit Number	Date Released By E-Mail	Dated Released On Website
Exhibit #32 (also 251) RHS 0004-0010	January 17, 1997	January 20, 1997
Exhibit #33 (also 252) RHS 0011-0015	January 28, 1997	January 29, 1997
Exhibit #34 (also 253) RHS 0016-0020	January 31, 1997	February 4, 1997
Exhibit #35 (also 255) RHS 0021-0027	March 17, 1997	March 23, 1997
Exhibit #36 (also 256) RHS 0028-0032	April 18, 1997	April 23, 1997
Exhibit #273 RHS 0088-0096	May 20, 1997	May 25, 1997
Exhibit #274 RHS 0097-0105	June 13, 1997	June 19, 1997

2. NetUSA (“NTSA”)

Exhibit #90 (also 258) RHS 0033-0042	February 21, 1997	February 28, 1997
Exhibit #91 (also 259) RHS 0043-0047	February 21, 1997	March 5, 1997
Exhibit #92 (also 260) RHS 0048-0052	April 18, 1997	April 23, 1997
Exhibit #106 (also 274) RHS 0097-0105	June 13, 1997	June 19, 1997

3. Neotherapeutics (“NEOT”)

Exhibit #94 (also 224) RHS 0053-0064	March 28, 1997	April 3, 1997
Exhibit # 95 (also 263) RHS 0065-0068	April 18, 1997	April 23, 1997
Exhibit # 105 (also 273) RHS 0088-0096	May 20, 1997	May 25, 1997
Exhibit # 106 (also 274) RHS 0097-0105	June 13, 1997	June 19, 1997

4. LCAVision (“LCAV”)

Exhibit # 97 (also 265) RHS 0069-0078	April 25, 1997	May 2, 1997
Exhibit #105 (also 273) RHS 0088-0096	May 20, 1997	May 25, 1997

5. Easy Cellular, Inc.(“EZCL”)

Exhibit #99 (also 267)	May 30, 1997	June 2, 1997
Exhibit # 106 (also 274) RHS 0097-0105	June 13, 1997	June 19, 1997

6. Casmyn Corp.(“CMYN”)

Exhibit #80 (also 236) RHS 0106-0115	June 27, 1997	July 3, 1997
Exhibit # 686 RHS 0116-0122	October 11, 1997	October 17, 1997

7. Georgian Bancorp. Inc. (“GRB”)

Exhibit #81 (also 237) RHS 0123-0134	August 29, 1997	September 3, 1997
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8. Grand Havana Enterprises, Inc. (“PUFF”)

Exhibit #82 (also 238) RHS 0135-0144	September 26, 1997	October 2, 1997
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9. Columbia Capital Corporation (“CLCK”)

Exhibit #101 (also 269) RHS 0145-0155	October 31, 1997	November 4, 1997
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10. Waterpur International (“WPUR”)

Exhibit #103 (also 271) RHS 0156-0163	December 5, 1997	December 11, 1997
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11. American Technologies Group (“ATEG”)

Exhibit #107 (also 275) RHS 0164-0176	February 13, 1998	February 19, 1998
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12. Brighton Technologies Corp. (“BGHT “)

Exhibit #306 (also 674) RHS 0177-0187	October 30, 1998	November 5, 1998
Exhibit #225 (also 588)	March 18, 1999	March 25, 1999

13. Pay for View. Com (“PAYV”)

Exhibit #231 (also 594) EGXX 0015-0027	June 26, 1999 July 6, 1999	
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14. Q-Seven Systems (“QSSY”)

Exhibit #231 (also 594) EGXX 0031-0045; 0062	July 13, 1999 August 5, 1999 August 11, 1999	
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15. BrowseSafe.com (“PGPG”)

Exhibit # 231 (also 594) EGXX 0045 - 0084	August 10, 1999 August 10, 1999 August 13, 1999 August 19, 1999 September 1, 1999 September 21, 1999 September 25, 1999	
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16. Technology Logistics Systems (“TLOS”)

Exhibit #231 (also 594) EGXX 0074-0079	September 12, 1999	
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**17. What’s For Free Technologies, (“WFFT”)
Inc.**

Exhibit #226 (also 589) RHS 0191-0198	February 28, 2000 March 7, 2000	
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EXHIBIT 572

Subject: Wire Confirmations

Description: Banking records corroborating wires to Georgian Trust, John Jackson, and MSP Technologies.

Relevance: Supports claim of bona fide investment activities by Petitioner and his entities.

Barclays Grand Turk Account – Vector Keel

Transactions by Payee 01/30/1996 through 01/25/1999

11:37 AM
03/23/05
Accrual Basis

VECTOR KEEL, LTD.
Custom Transaction Detail Report
All Transactions

Type	Date	Name	Memo	Account	Split	Amount	Balance
CHECK DEPOSIT							
Deposit	4/13/1998	CHECK DEPOSIT	533,545	Barclays Grand Turk	Harold Clifford Pope	2,000.00	2,000.00
Deposit	9/16/1998	CHECK DEPOSIT	478,504,520	Barclays Grand Turk	Harold Clifford Pope	3,000.00	5,000.00
Deposit	11/6/1998	CHECK DEPOSIT	432,487,496	Barclays Grand Turk	Harold Clifford Pope	3,000.00	8,000.00
Deposit	1/25/1999	CHECK DEPOSIT	7X902.78	Barclays Grand Turk	IPO	6,319.46	14,319.46
Total CHECK DEPOSIT							14,319.46
Intl Co Svcs							
Check	1/17/1997	Intl Co Svcs	InvReesa	Barclays Grand Turk	IPO	-1,800.00	-1,800.00
Check	3/7/1997	Intl Co Svcs	Notariz Trade auth	Barclays Grand Turk	IPO	-80.00	-1,880.00
Total Intl Co Svcs							-1,880.00
Wire							
Check	3/7/1997	Wire	Fee Vision	Barclays Grand Turk	Fee	-10,000.00	-10,000.00
Check	8/14/1997	Wire	Smith Barney TRF	Barclays Grand Turk	SB \$\$ (ICSL)	-250,000.00	-260,000.00
Check	9/4/1997	Wire	JF	Barclays Grand Turk	John Jackson	-25,000.00	-285,000.00
Check	9/9/1997	Wire	JF	Barclays Grand Turk	John Jackson	-25,000.00	-310,000.00
Check	10/14/1997	Wire	JF	Barclays Grand Turk	IPO	-50,000.00	-360,000.00
Check	10/15/1997	Wire	JF	Barclays Grand Turk	Oliver Moench	-10,000.00	-370,000.00
Check	11/3/1997	Wire	JF	Barclays Grand Turk	American Fire Retardant	-30,000.00	-400,000.00
Check	11/3/1997	Wire	JF	Barclays Grand Turk	FPL, Inc.	-10,000.00	-410,000.00
Check	11/9/1997	Wire	JF	Barclays Grand Turk	Ingrid Nehmitz	-10,000.00	-420,000.00
Check	11/27/1997	Wire	JF	Barclays Grand Turk	IPO	-25,000.00	-445,000.00
Check	11/27/1997	Wire	JF	Barclays Grand Turk	Harold Clifford Pope	-22,000.00	-467,000.00
Check	11/27/1997	Wire	JF	Barclays Grand Turk	InvResearch	-50,000.00	-517,000.00
Check	12/16/1997	Wire	JF	Barclays Grand Turk	Kimberly Franklin	-70,000.00	-587,000.00
Check	1/5/1998	Wire	Margin Deposit	Barclays Grand Turk	UNION SECURITIES \$\$	-125,000.00	-712,000.00
Check	1/7/1998	Wire	JF	Barclays Grand Turk	Red Rooster	-10,000.00	-722,000.00
Check	2/5/1998	Wire	JF	Barclays Grand Turk	Wentur & Chachas	-20,000.00	-742,000.00
Check	3/31/1998	Wire	JF	Barclays Grand Turk	Bright Lane Fund HK	-200,000.00	-942,000.00
Check	5/5/1998	Wire	JF	Barclays Grand Turk	Red Rooster	-5,000.00	-947,000.00
Check	8/17/1998	Wire	JF	Barclays Grand Turk	Amalgamated Expl	-20,000.00	-967,000.00
Check	9/22/1998	Wire	JF	Barclays Grand Turk	Red Rooster	-5,000.00	-972,000.00
Check	9/22/1998	Wire	JF	Barclays Grand Turk	InvResearch	-10,000.00	-982,000.00
Check	9/22/1998	Wire	JF	Barclays Grand Turk	Net Services Marketing	-20,000.00	-1,002,000.00
Check	9/24/1998	Wire	JF	Barclays Grand Turk	Oil & Gas Technology Fu...	-250,000.00	-1,252,000.00
Check	12/8/1998	Wire	JF	Barclays Grand Turk	Red Rooster	-2,500.00	-1,254,500.00
Check	12/23/1998	Wire	JF	Barclays Grand Turk	Oil & Gas Technology Fu...	-30,000.00	-1,284,500.00
Check	12/23/1998	Wire	JF	Barclays Grand Turk	Seed and Berry IOLTA Tr...	-70,000.00	-1,354,500.00
Total Wire							-1,354,500.00

Exhibit 580 – Medical Documentation of Visual Impairment and Surgery

This exhibit includes medical records confirming Petitioner’s diagnosis of progressive visual impairment and subsequent corrective surgery in 2022. These limitations significantly impeded Petitioner’s ability to review physical and scanned evidence prior to 2024, justifying relief under Rule 60(b)(6).



Name: James Franklin | DOB: 10/3/1963 | MRN: 9590338 | PCP: Nopcp Asked

Note From Your Admission on 05/29/22

Op Note by Maryam Ghiassi, MD at 5/29/2022 6:53 PM

Attestation signed by Scott Oliver, MD at 6/9/2022 4:43 PM

I was present for the entire procedure.
Scott Oliver, MD

PATIENT: James Franklin

UH No.: 9590338

Date: 5/30/2022

RESPONSIBLE STAFF SURGEON: Scott Oliver MD

FELLOW OR CONSULTANT: Maryam Ghiassi, MD

HOUSESTAFF SURGEON: No qualified housestaff surgeon was available to assist during the case.

PROCEDURAL EYE: left eye

PREOPERATIVE DIAGNOSIS:

1. Macula on retinal detachment
2. Lens Status : cataract
3. Proliferative vitreoretinopathy

POSTOPERATIVE DIAGNOSIS: same

OPERATION PERFORMED:

1. Retinal detachment repair utilizing 23 auge pars plana vitrectomy, perfluorocarbon, endolaser, and 5000 cs SO endotamponade

ANESTHESIA: MAC Retrobulbar

ESTIMATED BLOOD LOSS: Less than 2 cc.

IMPLANTS: None.

COMPLICATIONS: None.

DRAINS: None.

INDICATIONS:

This is a patient with clinical evidence of a mac on retinal detachment. Patient had a prior detachment with extensive inferior PVR requiring a retinectomy from 4:30 to 7:30. SOR was done in March 22. Patient presented with a new nasal retinal detachment with anterior loop PVR at 8'o clock with fibrotic membrane at 9'o clock. No clear breaks were identified preop. Surgical repair was recommended. Alternatives, including observation, laser demarcation, and scleral buckling were discussed. Risks of surgery, including pain, bleeding, infection, cataract progression, loss of vision, loss of the eye, cosmetic disfigurement, and need for more surgery were discussed with the patient, who elected to proceed and gave informed consent.

DESCRIPTION OF OPERATION:

The correct patient and operative eye was identified and marked in the pre-operative area and confirmed with the patient. The patient was brought to the operating room and the anesthesia team placed appropriate cardiac and respiratory monitoring. The non-operative eye was shielded. A Retrobulbar block was placed consisting of 5cc of 50:50 mixture of 2% lidocaine with 0.75% marcaine. The operative eye was prepped and draped in the usual sterile ophthalmic fashion. A sterile lid speculum was placed.

A peritomy was performed 360 degrees. The sub-Tenon space was accessed in the oblique quadrants with blunt dissection. 2-0 silk ties were placed around each of the four rectus muscles with muscle hooks. Each

muscle was inspected to ensure that it was not split. The intramuscular septum was dissected away from the muscle insertion. The four quadrants were inspected and superior quadrants were found to have extensive scleral thinning. At this time, it was decided not to place a scleral buckle due to high risk of globe perforation.

In the inferotemporal quadrant, a trocar cannula was inserted at an oblique angle 4 mm behind the limbus. The infusion line was cleared of air and inserted at this site in the on position at an infusion pressure of 25 mmHg. Additional trocar cannulae were inserted superonasally and superotemporally in an identical fashion. The light pipe and vitrector were inserted into the eye, and a core vitrectomy was performed. Kenalog was instilled. Aspiration over the optic nerve was used to confirm that a posterior vitreous separation was present. Upon close inspection with scleral depression to causative breaks were identified. There was fluid extending from 12:30 to 6'o clock at the edge of the retinectomy.

Perfluoron was instilled via a vented Chang cannula to the level of the equator. Scleral depression was done under PFL to look for fluid egress. The peripheral vitreous was then trimmed with the aid of scleral depression. 23G serrated forceps were used to peel the fibrotic membrane at 9'o clock. After peeling a Retinal breaks were present at 9'o clock. Meticulous shaving of the vitreous was performed at the break. Three rows of laser was applied around the break. The laser was extending superiorly to connect the laser circlarge 360. Scatter laser was placed radially anterior to laser line to prevent from SRF extension. 360 degree depression was used to confirm that there were no iatrogenic breaks. The infusion was switched to air and air-fluid exchange was performed with meticulous aspiration at the most posterior break to achieve flattening of the retina. An air-Perfluoron exchange was performed until the retina lay completely flat under air. Three circumferential rows of laser were placed around all of the retinal defects.

At this point 5000 cs SO was instilled under direct visualization. At this point, all instruments and cannulae were removed from the eye. Sclerotomies were closed 7-0 vicryl and conjunctiva was reapproximated using 6-0 plain gut sutures.

Subconjunctival dexamethasone and cefazolin were placed. Tobradex ointment were placed in the eye, which was patched and shielded after removing Betadine from the skin. The patient tolerated the procedure well without apparent complications, and was discharged to Recovery in stable condition.

Dr. Ghiassi assisted in visualization and scleral depression during the case.

